

PL Sum. J.

Ex. 040



Transcript of **Brenda Conner**

Friday, May 20, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 116450

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 W.K., E.H., M.M., R.P.,
5 M.B., D.P., A.F., C.A.,
6 K.K., K.P., and T.H.,
7 Plaintiffs,

8 vs.

9 CASE NO. 1:20-cv-5263-MHC

10 Red Roof INNS, INC., FMW
11 RRI NC, LLC, Red Roof
12 FRANCHISING, LLC, RRI WEST
13 MANAGEMENT, LLC, Varahi Hotel, LLC,
14 WESTMONT HOSPITALITY GROUP,
15 INC., and RRI, III, LLC,
16 Defendants.

17 JANE DOE 1-4,
18 Plaintiff,

19 Vs.

20 CASE NO: 1:21-cv-04278-WMR

21 Red Roof INNS, INC., et al,
22 Defendant.

23 J.A.,
24 Plaintiff,

25 Vs.

26 CASE NO: 1:21-cv-03655-TWT

27 Red Roof INSS, INC.,
28 Red Roof FRANCHISING, LLC,
29 And Varahi Hotel, LLC,
30 Defendants.

31 - - -

32 Videotaped deposition of BRENDA CONNER,

33 Taken by Patrick J. McDonough,

34 Before Amanda F. Rogers,
35 Certified Court Reporter,

— — —

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25 ALSO PRESENT:

Summer Mankee, Videographer

1 maintenance.

2 Q Okay. And you left then, around when?

3 A I think it was like -- it was like
4 nine and a half years later. Then I came back in
5 like 2000-something. I think it was like '13 to
6 '16.

7 Q Okay. And if you want to look at
8 number 3, it talks about you being here 2013
9 through 2016, is that right?

10 MR. KEITH: Objection.

11 THE WITNESS: Yes.

12 BY MR. MCDONOUGH:

13 Q All right. And tell me who hired you
14 then?

15 A Mr. Bob hired me then.

16 Q And what did you do -- do you know his
17 last name?

18 A Patel.

19 Q Patel. And what did he hire you to
20 do?

21 A Housekeeping.

22 Q And what shift did you work then?

23 A Morning. That was my first shift.

24 Q And when, that time, did you end your
25 employment?

1 THE WITNESS: And that's why I told
2 her. That was the one that I knew because there
3 were some teenagers that stayed over my area
4 stayed there.

5 BY MR. MCDONOUGH:

6 Q Okay. And tell me what you observed
7 when you went in and cleaned the rooms.

8 A In one room, when I got there one
9 morning, it was a whole lot of blood and stuff
10 all over the room. We had to clean it up. So I
11 didn't really know what happened that morning.
12 Other times we'd clean up, we'd find like a whole
13 lot of condoms all over the floor. We had to be
14 careful when you put your hand up under the
15 mattress because some of them would leave needles
16 and stuff up under the mattresses.

17 Q Did these girls that you've been
18 talking about ever request extra towels?

19 MR. KEITH: Objection.

20 THE WITNESS: Yes. Always hand
21 towels.

22 BY MR. MCDONOUGH:

23 Q And did you see anything else in the
24 rooms that concerns you?

25 MR. KEITH: Objection.

1 THE WITNESS: Yes. A whole lot of
2 lubricants and condoms on the dressers.

3 BY MR. MCDONOUGH:

4 Q All right. And where would -- where
5 did you clean in the buildings? All of the
6 buildings?

7 A Yes. All of them. Mainly the first
8 building and sometimes we would go over to the
9 second building. That's the one we don't have
10 enough worker staff. So we would have to go to
11 the other building.

12 Q And you said Bob Patel hired you, is
13 that right?

14 A Yes.

15 Q And how often did he work there?

16 A Basically every day. He would come in
17 the morning. He would be there until halfway
18 through the day or mostly all day because
19 sometimes he will work the whole day.

20 Q Did you know a Rita Patel?

21 A Yes.

22 Q And how did you know her?

23 A That's his wife. And me and her got
24 into it too.

25 Q Did she work there also?

1 Q All right. And what did -- what did
2 Bob and Rita tell you to do if someone
3 complained?

4 MR. KEITH: Objection.

5 THE WITNESS: To give them whatever
6 they needed so they really didn't have to pay
7 nobody back.

8 BY MR. MCDONOUGH:

9 Q And while you were there with the
10 Patels during that time, did you receive any
11 training?

12 A No.

13 Q Any training on safety in general?

14 A No.

15 Q Any training on sex trafficking?

16 A No.

17 Q Any training on prostitution?

18 A No.

19 Q Did Rita Patel ever talk to you about
20 how these girls looked?

21 A Yes. Well, in her word as she says:
22 "Look at them. They're not dressed right." And
23 half of the time we just laughed and we'd shake
24 our head and keep going.

25 Q And give me an example of how they

1 were dressed.

2 A Half of them had on really, really
3 short shirts, skimpy tops, some of them had on --
4 they would come to the door in their underclothes
5 and nothing but a robe, stuff like that.

6 Q You had mentioned there were ten or
7 more girls that were doing this --

8 A Yes.

9 Q -- on average? How many people did
10 you witness going into their rooms?

11 MR. KEITH: Objection.

12 THE WITNESS: Several.

13 BY MR. MCDONOUGH:

14 Q Was it every day?

15 A Basically when I see them, yes. It
16 was basically every day.

17 Q All day?

18 A Mostly.

19 Q Okay. Can you turn to -- let me ask
20 you another question: Seeing all of that, did
21 you ever call the police?

22 A No.

23 Q And why is that?

24 A Because he told us don't interact and
25 don't call anybody. So what were we supposed to

1 come downstairs, sit in his car. He would go in
2 there and sit in the lobby.

3 Q So if you could, just in a little more
4 detail, explain what you saw, what was going on
5 when he came down and sat in his car?

6 A When he came down, he -- like he would
7 sit in his truck. But he always kept his eyes
8 up. He looked upstairs right in his room.

9 Q And what happened in his room?

10 A Well, he would see a guy go in. And
11 he will stay downstairs until they leave or he
12 would sit in the office.

13 Q And how often did you see him?

14 A Basically every day.

15 Q For how long?

16 A From the time I was out there until
17 like about a year. But he stayed in 201 until
18 they put him out.

19 Q All right. And did you ever see him
20 interact with Bob Patel?

21 A He talked to Bob.

22 Q And did he ever interact with Rita
23 Patel?

24 A I really couldn't tell if he talked to
25 Rita. She would say a couple of words and then

1 is what I am asking you. I object to the
2 responsiveness. You said that you learned about
3 sex trafficking on what you saw on TV in 2013 to
4 2016?

5 A It was way before 2013 that I really
6 learned about sex trafficking.

7 Q Okay. So by 2013 to 2016, you were
8 fully aware of what sex trafficking was?

9 A Yes.

10 Q All right. And so you thought these
11 people were being sex trafficked out there?

12 A To me, yes.

13 Q To you?

14 A Yes.

15 Q Did you call the police?

16 A No, because Mr. Bob told us don't
17 interfere with any of them or what they -- what
18 they had going on. So by me not losing my job, I
19 am going to do what my boss tell me to do.

20 Q So you thought these women were being
21 forced to have sex with men and you didn't call
22 the police?

23 A I wasn't there at night. I didn't go
24 in their rooms so I can't actually sit in there
25 and tell you what is going on behind closed

1 Q If I got this right, you said while
2 Anthony was there, he was with one girl?

3 A Yes. I forget her name. We talked
4 all the time.

5 Q Her name was [REDACTED]?

6 A Yes. That's right. [REDACTED].

7 Q [REDACTED], right?

8 A Yes. Last time I seen her on Facebook
9 she said she got her life together and got her
10 son. And I told her, "Praise God."

11 Q And you said you worked the day shift,
12 correct?

13 A Yes.

14 Q What time did you get off?

15 A Sometimes 3:00, 4:00, or 5:00,
16 different hours.

17 Q So you weren't there at night?

18 A No.

19 Q So you do not know what Forrest did
20 with anybody after -- after work, right?

21 A No.

22 Q Did you know that Anthony was on the
23 do-not-rent list?

24 A Yeah. There were plenty of people on
25 the do-not-rent list, but he still let them come

1 back.

2 Q Forrest let him come back?

3 A Well, Mr. Bob have to let him come
4 back, too, because he is the owner. He is
5 getting rid of them to come back. Now, he put
6 them on the do-not-rent list -- the do-not-rent
7 list. They came back. So I don't know if
8 Forrest that night was putting them in the room
9 or whoever was working that night.

10 Q Well, Bob wasn't working the front
11 desk, was he?

12 A Yes, Bob was working the front desk.

13 Q Checking in people?

14 A Yes.

15 Q At night?

16 A I don't know if it was at night
17 because I wasn't there. So I cannot tell you if
18 he was there at night. I don't know. I left
19 between 3:00, 4:00, and 5:00.

20 Q Did Forrest ever tell you that he let
21 folks on the do-not-rent list stay there?

22 A No. Me and Forrest didn't ever talk
23 about what he did on his hours of duty.

24 Q Were you and Forrest friends?

25 A Yes. Associated friends at work.

1 Bob, "I have concerns that there are
2 prostitutes"?

3 A Bob also seen what was going on. No,
4 I did not go tell Bob, but Bob also seen.

5 Q Listen to my question. Did you go
6 tell Bob that you had any concerns about
7 prostitution going on out there?

8 A No.

9 Q Did you go tell Bob that you had any
10 concerns about sex trafficking going on out
11 there?

12 A No.

13 Q Did you go tell Bob that you had been
14 approached by women looking for help and you had
15 told them about safe houses to go to?

16 A No. I did not go tell him because he
17 told us, do not interact with none of them. Do
18 not talk to none of them. So that is why I
19 didn't go tell Bob.

20 Q You did not tell him about any of your
21 concerns if there were concerns, right?

22 MS. HOYING: Objection.

23 THE WITNESS: No. Because of the
24 simple fact, he told us, do not interact with
25 none of the guests, period. We are not supposed

1 got out of a room had like little bags of it in
2 there. And I don't know if they -- because they
3 said, flush it down the toilet. I guess he
4 flushed it down the toilet because I went back to
5 the room and cleaned the room.

6 Q Were Bob and Rita ever outside with
7 you when you would see these women in virtually
8 no clothes hanging over the balcony?

9 MR. KEITH: Objection.

10 MR. REAM: Objection.

11 BY MS. HOYING

12 Q Were Bob or Rita ever outside with you
13 when you would see men going in and out of rooms
14 every 15 or 20 minutes?

15 A Yes.

16 Q Did you wear rubber gloves when you
17 cleaned rooms at the Red Roof?

18 A Mostly.

19 Q Why?

20 A Because they have stuff laying
21 everywhere. You don't know what it is, liquid
22 this way, and you are not supposed to put your
23 hands on anything like that because you don't
24 know what it is.

25 Q Did Bob ever tell you that he was

C E R T I F I C A T E

GEORGIA

FULTON COUNTY

I hereby certify that the above and foregoing pages 1 through 114 are a true, complete, correct, and exact transcript of my shorthand notes taken in the above-referenced matter;

That same constitutes a true, complete, correct, and exact record of the above-referenced matter;

That same was transcribed through computer-assisted transcription;

That I am not of kin or counsel to any of the attorneys or parties, nor am I in the regular employ of any of the attorneys or parties;

This 1st day of June, 2022.



Amanda F. Rogers, CCR B-2274
Certified Court Reporter